

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

Hon. Renee M. Bumb

This Document Relates To:
All Actions

Civ. No. 19-2875 (RMB/SAK)

**PLAINTIFFS' NOTICE OF VIDEOTAPED
DEPOSITION TO PARAS SHETH**

**TO: Alexia Brancato
Lindsey Foster
Kirkland & Ellis, LLP
601 Lexington Avenue,
New York, NY 10022**

*Counsel for Defendants Torrent Pharmaceuticals LTD
and Torrent Pharma Inc.*

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Paras Sheth, General Manager – Procurement with Torrent Pharmaceuticals LTD. The deposition will commence on **Thursday September 12, 2024, at 7:00 A.M. Eastern Time**, and continue until completion, via remote deposition, in accordance with the Fact Witness Deposition Protocol and Case Management Order No. 20, filed on November 17, 2020 (Document 632).

The witness shall produce the documents requested at Exhibit A, attached hereto, at least 5 days in advance of this noticed deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

Stacy Burrows
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5201 Johnson Dr., Ste. 110
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And

Madeline Pendley
Levin, Papantonio, Proctor,
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316 Bylen Street, Ste. 600
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The deposition will be taken before an officer authorized to administer oaths. Testimony given during the deposition will be recorded by sound video recording and stenographic means.

DATED this 5th day of September 2024.

FOR PLAINTIFFS

/s/ Stacy A. Burrows
Stacy A. Burrows
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EXHIBIT A

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Paras Sheth.
2. The complete production of Paras Sheth's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

CERTIFICATE OF SERVICE

I, Stacy Burrows, hereby certify that on September 4, 2024, I caused true and correct copies of the foregoing to be transmitted via ECF to all counsel having registered an appearance on ECF, with courtesy copies served on counsel for Torrent Pharmaceuticals Limited and Torrent Pharma Inc., and Defendants' counsel, as listed above, via email.

DATED this 4th day of September 2024.

/s/ Stacy A. Burrows

Stacy A. Burrows

Barton and Burrows, LLC

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